## HERITAGE-WTI, Inc.

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ISO 9001: 2008

ISO 14001: 2004

November 18, 2010 VIA UPS

Mr. George Czerniak, Chief U.S. EPA Region V Air Enforcement and Compliance Assurance Branch Mail Code AE-17J 77 West Jackson Chicago, IL 60604

Mr. Chris Korleski, Director Ohio EPA PO Box 1049 Columbus, OH 43216-1049

RE: Heritage-WTI, Inc.

Facility ID: 02-15-02-0233 MACT Subpart EEE CFT Final Report NOC



Please find enclosed the Comprehensive Performance Test Final Report and Notification of Compliance for Heritage-WTI, Inc. (WTI) as prepared by AECOM Inc. This document contains information on the WTI facility and as well as results from the Comprehensive Performance Test (CPT) conducted in March, April, May, and September of 2010.

As operator of a Hazardous Waste Combustor (HWC), WTI is required to demonstrate compliance with the Maximum Achievable Control Technology (MACT) emission standards set forth in Title 40 of the Code of Federal Regulations Part 63, Subpart EEE (HWC MACT). WTI commenced the MACT CPT on March 29, 2010 and completed the test on September 16, 2010. During this period, WTI was able to demonstrate compliance with all required emissions standards and establish operating parameter limits (OPLs) to ensure future compliance. The results of this testing, the established OPLs, and supporting documentation can be found within the attached Notice of Compliance and CPT Report.

WTI holds the some of the information contained in the CPT Report and NOC as Confidential Business Information (CBI). The specified CBI is identified where applicable within the report. The following report pages contain information that is held as CBI by WTI:

Page 2-5 - Table 2-3

Page 2-7 — Table 2-5

Page 4-2 - Table 4-1

Page 4-3 - Table 4-2

Page 4-4 — Table 4-3

Page 4-9 - Table 4-9

Appendix A – Flue Gas Cleaning System Process Data (Pages A-143 to A-202)



Redacted versions of these pages have been enclosed for public viewing. Please insert these pages when providing this document to the public.

If you have questions concerning the content of this report, please contact Vince Waggle of my staff at 330-386-2182.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Frank Murray

Vice President and General Manager

Dan Murrer

Cc: Pam Korenewych, OEPA-DAPC-NEDO (Cover Letter and CPT/NOC Report)

Charles Hall, USEPA Region V (Cover Letter only)

William MacDowell, USEPA Region V (Cover Letter only)

Ed Fasco, OEPA-DAPC-NEDO (Cover Letter only)

Dennis Bush, OEPA-DAPC-NEDO (Cover Letter only)

Michelle Tarka, OEPA-DHWM-NEDO (Cover Letter only)

Frank Popotnik, OEPA-DHWM-NEDO (Cover Letter only)